

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

Arigna Technology Ltd.,	§	
	§	Case No. 2:21-cv-00054-JRG-RSP
	§	
Plaintiff,	§	
	§	<b><u>JURY TRIAL DEMANDED</u></b>
v.	§	
	§	
Volkswagen AG et al.	§	
	§	
Defendants.	§	
	§	
	§	
	§	

**STIPULATION TO DISMISS WITHOUT PREJUDICE GENERAL MOTORS  
COMPANY**

Plaintiff Arigna Technology Ltd. (“Arigna”) and Defendants General Motors Company and General Motors LLC (“GM”) jointly submit this Stipulation to dismiss without prejudice Defendant General Motors Company and in support thereof state:

1. Arigna filed this action for patent infringement against GM via the First Amended Complaint (Dkt. 28) on March 9, 2021, alleging infringement of U.S. Patent Nos. 7,397,318 and 8,247,867 (the “Patents-in-Suit”).

2. On April 29, 2021, counsel for GM represented to Arigna that General Motors Company is a holding company and does not make, use, offer for sale, sell, or import into the United States the accused vehicles or components as alleged in the First Amended Complaint, and that General Motors LLC is the legal entity responsible for any manufacture, use, sale, offer for sale, or importation into the United States of the accused vehicles and components alleged in the First Amended Complaint..

3. General Motors LLC has agreed not to withhold relevant discovery, if any,

discovered to be in the possession, custody, or control of General Motors Company on the basis that is no longer a party to this action. This agreement does not preclude any other objection, including, without limitation, any privilege objection.

4. For purposes of this action only, General Motors LLC has agreed not to object to any award of damages on the ground that such damages should be assessed against General Motors Company rather than against General Motors LLC. This agreement does not preclude any other objection to the damages claimed by plaintiff, including, without limitation, any objection that alleged damages are based on revenues that are not attributable to making, using, offering for sale, selling, or importing into the United States the accused products.

5. Arigna expressly does not stipulate or agree to any of the foregoing facts and reserves its right to dispute any of the foregoing factual representations with evidence to the contrary.

6. In reliance upon the representations and warranties made in paragraphs 2-4 above, Arigna agrees to dismiss General Motors Company, without prejudice as allowed under Rule 41(a) of the Federal Rules of Civil Procedure.

7. Arigna has not released, and nothing in this Stipulation should be construed as a release or discharge of, any claim Arigna has or may have in the future against any defendant named in this action or any other asserted infringer of the patents-in-suit. All rights have been expressly reserved.

**NOW, THEREFORE**, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), **IT IS HEREBY STIPULATED AND AGREED**, by and between Arigna Technology Ltd., General Motors LLC, and General Motors Company, that:

General Motors Company is dismissed without prejudice.

DATED: May 18, 2021

Respectfully submitted,

By: /s/ John Schiltz

Matthew R. Berry

Email: mberry@susmangodfrey.com

Rachel S. Black

Email: rblack@susmangodfrey.com

Andres Healy

Email: ahealy@susmangodfrey.com

John E. Schiltz

Email: jschiltz@susmangodfrey.com

Nicholas Crown

Email: ncrown@susmangodfrey.com

Danielle Nicholson

Email: dnicholson@susmangodfrey.com

**SUSMAN GODFREY L.L.P.**

1201 Third Avenue, Suite 3800

Seattle, TX 98101-3000

Phone: (206) 516-3880

Fax: (206) 516-3883

*Of Counsel:*

T. John Ward, Jr.

Texas State Bar No. 00794818

E-mail: jw@wsfirm.com

Claire Abernathy Henry

Texas State Bar No. 24053063

E-mail: claire@wsfirm.com

Charles Everingham IV

Texas State Bar No. 00787447

E-mail: ce@wsfirm.com

**WARD, SMITH & HILL, PLLC**

1507 Bill Owens Parkway

Longview, TX 75604

Phone: (903) 757-6400

Fax: (903) 757-2323

*Attorneys for Arigna Technology Limited*

DATED: May 18, 2021

Respectfully submitted,

By: /s/ Victoria F. Maroulis w/ permission  
Marissa Ducca

Victoria F. Maroulis (*admitted to practice in  
the Eastern District of Texas*)

*Lead Trial Counsel*

victoriamaroulis@quinnemanuel.com

**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**

555 Twin Dolphin Dr., 5th Floor

Redwood City, CA 94065

Telephone: (650) 801 5000

Facsimile: (650) 801 5100

Marissa Ducca (*admitted to practice in the  
Eastern District of Texas*)

marissaducca@quinnemanuel.com

**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**

1300 I St NW, Suite 900

Washington, D.C. 200005

Telephone: (202) 538 8000

Facsimile: (202) 538 8100

G. Blake Thompson (State Bar No. 24042033)

blake@themannfirm.com

J. Mark Mann (State Bar No. 12926150)

mark@themannfirm.com

**MANN | TINDEL | THOMPSON**

201 E. Howard St.

Henderson, TX 75654

Telephone: (903) 657-8540

Facsimile: (903) 657-6003

***Attorneys for Defendants General Motors  
Company and General Motors LLC***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on May 18, 2021.

/s/ Marissa Ducca

Marissa Ducca

marissaducca@quinnemanuel.com

QUINN EMANUEL URQUHART & SULLIVAN,  
LLP

1300 I St NW, Suite 900

Washington, D.C. 200005

Telephone: (202) 538 8000

Facsimile: (202) 538 8100

***Attorneys for Defendants General Motors  
Company and General Motors LLC***